

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:23CR268
v.	§	Judge Jordan
	§	
ROBERTA MARIE KHAN (4)	§	
a/k/a Roberta Marie Khan,	§	
a/k/a Ember, a/k/a Scarecrow	§	

ELEMENTS OF THE OFFENSE

The defendant, **Robberta Marie Khan a/k/a Roberta Marie Khan a/k/a Ember a/k/a Scarecrow (Khan)**, is charged in Count One of the Indictment with violating 18 U.S.C. §§ 2422(a) (Coercion and Enticement) & 2 (Aiding and Abetting). The elements of the offense that the government must prove beyond a reasonable doubt, but that **Khan** would admit if her plea is accepted, are:

18 U.S.C. § 2422(a): Coercion and Enticement

1. The defendant knowingly persuaded, induced, enticed, or coerced an individual to travel in interstate commerce, and attempted to do so; and
2. The purpose of the travel was for the individual to engage in prostitution, or any sexual activity for which a person can be charged with a criminal offense.

18 U.S.C. § 2: Aiding and Abetting

1. The offense of coercion and enticement was committed by some person;
2. The defendant was associated with the criminal venture;
3. The defendant purposefully participated in the criminal venture; and

4. The defendant sought by action to make that venture successful.

Respectfully submitted,

ABE MCGLOTHIN, JR.

ACTING UNITED STATES ATTORNEY

/s/

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served by electronic filing to opposing counsel on May 6, 2025.

/s/

Marisa J. Miller